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20 UNITED STATES DISTRICT COURT
21 FOR THE NORTHERN DISTRICT OF CALIFORNIA
22 SAN FRANCISCO DIVISION

23 AMERICAN FEDERATION OF
24 GOVERNMENT EMPLOYEES, AFL-CIO;
25 AMERICAN FEDERATION OF STATE
26 COUNTY AND MUNICIPAL EMPLOYEES,
27 AFL-CIO, et al.,

28 Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL
MANAGEMENT, et al.,

Defendants.

Case No. 3:25-cv-01780-WHA

**SUPPLEMENTAL DECLARATION OF
SHAWN PHETTEPLACE**

DECLARATION OF SHAWN PHETTEPLACE

I, Shawn Phetteplace, hereby declare as follows:

1. I am the national campaigns director at Main Street Alliance (“MSA”). This declaration supplements my earlier declaration filed February 23, 2025 (Dkt. 18-16).

2. My previous declaration discussed the variety of ways that MSA members rely on services provided by the Small Business Administration, which have been threatened by the mass termination of probationary employees from that agency. MSA also has members who rely on services provided by the U.S. Department of Agriculture (“USDA”), which are also threatened as a result of the mass termination of employees.

3. USDA offers a variety of programs through the Agricultural Marketing Service that help small farms and food-related businesses develop their markets. MSA members have taken advantage of these programs, including the Local Food Promotion Program (“LFP”) and the Resilient Food Systems Infrastructure (“RFSI”) program. These programs help support a robust local economy in agricultural areas.

4. For example, one of our members who operates a cider production business has received support from both of these USDA marketing programs, and has partnered with other local businesses that receive support from other USDA programs, to help his business grow. He has explained that the support provided by these programs enables him to take risks to grow his business that he could not otherwise have taken. The technical support provided by the USDA grant officer was essential in helping him navigate the complex rules for compliance with his LFP grant. The termination of federal employees who support grantees like this small business owner would make it extremely difficult for small businesses to take advantage of the opportunities offered by these programs. The RFSI program awards grant funding to the states to develop more and better markets for small farms and food businesses. Although the states distribute RSFI funds to grantees like this MSA member, the termination of federal employees at USDA who support these and similar programs is likely to undermine small businesses’ access to these and similar business development opportunities by making the operation of those programs at the federal level less efficient.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is true
2 and correct. Executed March 6, 2025 in Madison, Wisconsin.

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Shawn Phetteplace